

Timothy M. Stubson, Wyo. Bar. No. 6-3144  
 Holly Tysse Wyo. Bar. No. 7-5553  
 Brandon E. Pryde Wyo. Bar. No. 8-6883  
 Crowley Fleck, PLLP  
 111 West 2<sup>nd</sup> Street, Suite 220  
 Casper, WY 82601  
 (P) 307-265-2279  
 tstubson@crowleyfleck.com  
 htyssse@crowleyfleck.com  
 bpryde@crowleyfleck.com

and

Eugene M. LaFlamme\*  
 Jared B. Giroux\*  
 Jillian L. Lukens\*  
 McCoy Leavitt Laskey LLC  
 N19 W24200 Riverwood Drive, #125  
 Waukesha, WI 53188  
 (P) 262-522-7000  
 elaflamme@MLLlaw.com  
 jgiroux@MLLlaw.com  
 jlukens@MLLlaw.com

*Attorneys for Defendants, Jetson Electric Bikes, LLC  
 and Walmart Inc.*

*\*Attorneys admitted Pro Hac Vice*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH	)	
Individually and as Parent and Legal Guardian	)	
of W.W., K.W., G.W., and L.W., minor children	)	
and MATTHEW WADSWORTH	)	
Plaintiff,	)	Case No. 2:23-cv-00118-NDF
	)	
v.	)	<b>DEFENDANTS EXPERT</b>
	)	<b>WITNESS DISCLOSURES</b>
WALMART INC. and	)	
JETSON ELECTRIC BIKES, LLC	)	
	)	
Defendants.	)	<b>JURY TRIAL DEMANDED</b>

**DEFENDANTS' EXPERT WITNESS DISCLOSURES**

Pursuant to the Court’s Order Setting Case for Jury Trial and in accordance with Fed. R. Civ. P. 26(a)(2) and U.S.D.C.L.R. 26.1(3), Defendants, Jetson Electric Bikes, LLC and Walmart Inc. (hereinafter “Defendants”), by and through the undersigned counsel, hereby file their expert witness disclosures. Pursuant to the Court’s Order, Defendants designate their expert witnesses, including a comprehensive statement of expert’s opinions and the basis for the opinions in Exhibits A through Q.

Defendants reserve the right to supplement, update, or make substitutions to this list as the need may arise or as additional witnesses are identified in ongoing investigation and discovery.

**1. JOSEPH R. FILAS, CFI, CFEI, CFI(V)**

Rinkus Consulting Group, Inc  
8100 S. Akron Street, Suite 320  
Centennial, CO 80112

Mr. Filas, CFI, CFEI, CFI(V), will offer expert testimony in the area of origin and cause investigations. His opinions will be consistent with his written report, which is attached hereto as “Exhibit A”, his file materials, and deposition testimony if taken. The basis and substance of his opinions are set forth in his report and includes his review of the documents produced in this case, his review of discovery, his investigation, and his professional training, education, knowledge, experience, and skill. Defendants may utilize at trial as exhibits any of the above-referenced materials and/or photographs as a summary or in support of his opinions.

Mr. Filas’ curriculum vitae, including his prior testimony and publications, if any, is attached hereto as “Exhibit B”. Mr. Filas’ fee schedule is attached hereto as “Exhibit C”.

**2. GREGORY E. GORBETT, Ph.D., IAAI-CFI, CFEI, CFPS**

FIRE Dynamics Analysis  
330 Eastern Bypass, Suite 1  
PMB #231  
Richmond, KY 40475

Mr. Gorbett, Ph.D., IAAI-CFI, CFEI, CFPS, will offer expert testimony in the area of fire modeling and fire dynamics engineering and investigations. His opinions will be consistent with his written report, which is attached hereto as “Exhibit D”, his file materials, and deposition testimony if taken. The basis and substance of his opinions are set forth in his report and includes his review of the documents produced in this case, his review of discovery, his investigation, and his professional training, education, knowledge, experience, and skill. Defendants may utilize at trial as exhibits any of the above-referenced materials and/or photographs as a summary or in support of his opinions.

Mr. Gorbett’s curriculum vitae, including his prior testimony and publications, if any, is attached hereto as “Exhibit E”. Mr. Gorbett’s fee schedule is attached hereto as “Exhibit F”.

**3. SAMUEL SUDLER, III, PE, IntPE, DFE, F.NSPE, CFEI, CVFI**

SEA Limited  
795 Cromwell Park Drive, Suite N  
Glen Burnie, MD 21061

Mr. Sudler, PE, IntPE, DFE, F.NSPE, CFEI, CVFI, will offer expert testimony in the area of electrical engineering and failure investigations. His opinions will be consistent with his written report, which is attached hereto as “Exhibit G”, his file materials, and deposition testimony if taken. The basis and substance of his opinions are set forth in his report and includes his review of the documents produced in this case, his review of discovery, his investigation, and his professional training, education, knowledge, experience, and skill. Defendants may utilize at trial as exhibits any of the above-referenced materials and/or photographs as a summary or in support of his opinions.

Mr. Sudler’s curriculum vitae, including his prior testimony and publications, if any, is attached hereto as “Exhibit H”. Mr. Sudler’s fee schedule is attached hereto as “Exhibit I”.

**4. BRIAN STRANDJORD, PE, CFI, CFEI**

AEI Corporation  
8197 West Brandon Drive,  
Littleton, CO 80125

Mr. Strandjord, PE CFI, CFEI, will offer expert testimony in the area of mechanical and electrical engineering and failure investigations. His opinions will be consistent with his written report, which is attached hereto as “Exhibit J”, his file materials, and deposition testimony if taken. The basis and substance of his opinions are set forth in his report and includes his review of the documents produced in this case, his review of discovery, his investigation, and his professional training, education, knowledge, experience, and skill. Defendants may utilize at trial as exhibits any of the above-referenced materials and/or photographs as a summary or in support of his opinions.

Mr. Strandjord’s curriculum vitae, including his prior testimony and publications, if any, is attached hereto as “Exhibit K”. Mr. Strandjord’s fee schedule is attached hereto as “Exhibit L”.

**5. CLOIE JOHNSON, M.Ed., A.B.V.E.-D., C.C.M.**

OSC Vocational Systems, Inc.  
10132 NE 185<sup>th</sup> Street  
Bothell, WA 98011

Ms. Johnson, M.Ed., A.B.V.E.-D., C.C.M, will offer expert testimony in the area of vocational rehabilitation and life care planning. Her opinions will be consistent with her written report, which is attached hereto as “Exhibit M”, her file materials, and deposition testimony if taken. The basis and substance of her opinions are set forth in her report and includes her review of the documents produced in this case, her review of discovery, her investigation, and her professional training, education, knowledge, experience, and skill. Defendants may utilize at trial as exhibits any of the above-referenced materials and/or photographs as a summary or in support of her opinions.

Ms. Johnson’s curriculum vitae, including her prior testimony and publications, if any, is attached hereto as “Exhibit N”. Ms. Johnson’s fee schedule is attached hereto as “Exhibit O”.

**6. CHARITY ROWSEY, CPA, MAFF, CVA**

Rowsey Financial Forensics, LLC  
P.O. Box 59604

Helena, MT 59604

Ms. Rowsey, CPA, MAFF, CVA, is a certified public accountant and forensic financial investigator. Her opinions will be consistent with her written report, which is attached hereto as “Exhibit P”, her file materials, and deposition testimony if taken. The basis and substance of her opinions are set forth in her report and includes her review of the documents produced in this case, her review of discovery, her investigation, and her professional training, education, knowledge, experience, and skill. Defendants may utilize at trial as exhibits any of the above-referenced materials and/or photographs as a summary or in support of her opinions.

Ms. Rowsey’s curriculum vitae, including her prior testimony and publications, if any, is attached hereto as “Exhibit Q”. Ms. Rowsey charged \$385.00 per hour for her services.

7. Any consultant, investigator, or other person retained by any other party for purposes relating to this lawsuit.

8. Any health care providers or health professionals who rendered care to Plaintiffs relating to the underlying incident.

9. These Defendants reserve the right to supplement this disclosure statement with additional witnesses as discovery / disclosures proceed.

10. These Defendants reserve the right to elicit opinion testimony from non-retained and retained experts identified by any of the other parties to this action, using, if necessary, any exhibits identified by the other parties.

**McCOY LEAVITT LASKEY, LLC**

Dated: September 13, 2024

By: /s/Eugene M. LaFlamme

Eugene M. LaFlamme	<i>Pro Hac Vice</i>
Jared B. Giroux	<i>Pro Hac Vice</i>
Jillian L. Lukens	<i>Pro Hac Vice</i>
Riverwood Corporate Center III	

N19 W24200 Riverwood Drive, Ste. 125  
Waukesha, WI 53188  
Phone (262) 522-7000 - Fax (262) 522-7020  
[elaflamme@MLLlaw.com](mailto:elaflamme@MLLlaw.com)  
[jgiroux@MLLlaw.com](mailto:jgiroux@MLLlaw.com)  
[jlukens@MLLlaw.com](mailto:jlukens@MLLlaw.com)

and

**CROWLEY FLECK, PLLP**

Timothy Stubson, Wyo. Bar. No. 6-3144  
Holly Tysse, Wyo. Bar. No. 7-5553  
Brandon Pryde, Wyo. Bar. No. 8-6883  
111 West 2<sup>nd</sup> Street, Suite 220  
Casper, WY 82601  
Phone: (307) 265-2279  
[tstubson@crowleyfleck.com](mailto:tstubson@crowleyfleck.com)  
[htysse@crowleyfleck.com](mailto:htysse@crowleyfleck.com)  
[bpryde@crowleyfleck.com](mailto:bpryde@crowleyfleck.com)

*Attorneys for Defendants, Jetson Electric Bikes, LLC  
and Walmart Inc.*

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this document was served on the 13th day of September, 2024, upon all parties in the above cause by serving the attorneys of record at their respective addresses disclosed on the pleadings. Service was made by:

☐ U.S. Mail      ☐ Hand-Delivery      ☒ Email      ☐ Facsimile      ☒ Other – EDMS

Taly Goody, Esq.  
Greyson Goody, Esq.  
Goody Law Group, LLP  
8605 Santa Monica Blvd., #90793  
West Hollywood, CA 90069-4109  
[taly@goodylawgroup.com](mailto:taly@goodylawgroup.com)  
[greyson@goodylawgroup.com](mailto:greyson@goodylawgroup.com)  
[Maki@goodylawgroup.com](mailto:Maki@goodylawgroup.com)  
[Hilda@goodylawgroup.com](mailto:Hilda@goodylawgroup.com)

T. Michael Morgan, Esq.  
Rudwin Ayala, Esq.  
Eitan Goldrosen, Esq.  
Morgan & Morgan, P.A.  
20 N. Orange Ave., Suite 1600  
Orlando, FL 32801  
[mmorgan@forthepeople.com](mailto:mmorgan@forthepeople.com)  
[rayala@forthepeople.com](mailto:rayala@forthepeople.com)  
[egoldrosen@forthepeople.com](mailto:egoldrosen@forthepeople.com)  
[akelseyflowers@forthepeople.com](mailto:akelseyflowers@forthepeople.com);  
[csmaya@forthepeople.com](mailto:csmaya@forthepeople.com)

/s/ Angela J. Hinrichs  
Angela J. Hinrichs, Legal Assistant